

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE WESTERN DISTRICT OF
TEXAS
EL PASO DIVISION**

IN RE:	§	Chapter 13
DON CORNELL TURNER	§	Case No 21-30947-hcm
	§	
<i>Debtor</i>	§	

TRUSTEE’S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

To the Honorable H. Christopher Mott, United States Bankruptcy Judge:

Now comes Stuart C. Cox, Standing Chapter 13 Trustee (“Trustee”), and objects to Confirmation of the Debtor’s proposed Chapter 13 Plan and would show the Court:

1. Trustee objects to Debtor’s proposed plan whereby the non-standard plan provision concerning ongoing tax refunds prevents Debtor from contributing all disposable income to the plan, and is indicative of a lack of good faith in proposing same.

11 U.S.C. 1325(a)(3), 11 U.S.C. 1325(b)(1) and 11 U.S.C. 1322(a)(1).

2. Further, Trustee objects to confirmation of the plan whereby the plan has not been proposed in good faith. Trustee avers Debtor is funding a 2018 Chieftain Indian Motorcycle financed for 17,049.28 by Wayfinder Bank and is not necessary for reorganization in an 8% plan.

Relief Sought

Trustee prays for an Order Denying Confirmation of the proposed Chapter 13 Plan without prejudice to amend, or in the alternative, that the instant case be dismissed, and that the Court grant the Chapter 13 Trustee such other, additional and further relief to which he may be justly entitled.

Respectfully submitted,

/s/Stuart C. Cox
Stuart C. Cox Standing Chapter 13
Trustee SBN:00794992
1760 N. Lee Trevino Drive El Paso,
TX 79936
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN was served upon the parties listed below by United States Mail, first class, postage prepaid on January 26, 2022.

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/s/Stuart C. Cox
Stuart C. Cox